

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)

This document relates to:

*Horace Morris, et al. v. Islamic Republic of Iran*, No. 1:18-cv-05321 (GBD)(SN)

*August Bernaerts, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11865 (GBD)(SN)

**NON-U.S. NATIONAL PLAINTIFFS' NOTICE OF MOTION FOR PARTIAL FINAL  
DAMAGES JUDGMENTS AGAINST THE ISLAMIC REPUBLIC OF IRAN**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq. ("Goldman Declaration"), with the exhibits attached thereto, and the exhibits submitted with access restricted to the Court pursuant to the May 5, 2022 Order, ECF No. 7963, pertaining to expert reports submitted in support of default judgments, certain non-U.S. National Plaintiffs in the above-referenced matters who are identified in Exhibit A (the plaintiffs in Exhibit A are the "Moving Plaintiffs") (which is Exhibit B to the Proposed Order) to the Goldman Declaration and who each have a pending motion for judgment as to liability and damages for non-economic damages against the Islamic Republic of Iran at ECF No. 9322 (September 5, 2023), by and through their counsel, Anderson Kill P.C., respectfully move this Court for an ORDER:

- (1) on behalf of the Moving Plaintiffs, awarding the estates of the 9/11 decedents, through their personal representatives and on behalf of all survivors and all legally entitled beneficiaries and family members of such 9/11 decedents, as identified in Exhibit A, an award of economic damages in the amounts set forth in Exhibit A; AND,

(2) awarding the Moving Plaintiffs prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment for damages; AND,

(3) granting the Moving Plaintiffs permission to seek punitive damages, economic damages, and other appropriate damages, at a later date; AND,

(4) on behalf of the Moving Plaintiffs, granting permission for all other Plaintiffs in these actions not appearing in Exhibit A to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; AND,

(5) granting to the Moving Plaintiffs such other and further relief as this honorable court deems just and proper.

Dated: New York, New York  
May 24, 2024

Respectfully submitted,

/s/ Jerry S. Goldman

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